

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.)	CASE NO. 1:08 CV 2755
)	
Plaintiff,)	JUDGE WELLS
)	
v.)	<u>JOINT MOTION TO AMEND</u>
)	<u>CASE DEADLINES</u>
SAP AMERICA, INC., et al.)	
)	
Defendants.)	
)	

The parties, by and through their undersigned attorneys, hereby jointly request that the Court enter an order, in the form of the proposed order attached hereto, amending the case deadlines in this matter by granting the foregoing motion. In support of this motion, counsel for all parties state as follows:

1. Due to scheduling conflicts, the parties have been unable to schedule all remaining depositions for completion prior to the current discovery deadline of June 29, 2012.
2. However, all depositions are currently scheduled to be completed by August 3, 2012.
3. In addition, the current case schedule includes a single date for mutual exchanges of expert reports.
4. The parties have conferred and agree that plaintiff's expert reports should be submitted first, followed by defendants' reports, and then any rebuttal reports from plaintiff.
5. Further, it is the parties' view that expert discovery is unlikely to impact dispositive motions, and thus expert discovery may continue beyond the deadline for such motions.
6. Accordingly, the parties have agreed to a proposed amended case schedule, as reflected in the proposed order submitted with this motion, and request that the Court enter an order adopting the proposed schedule. It is the parties' view that the proposed amendments to case

deadlines are unlikely to impact the pretrial conference and trial date set in this matter. The parties are available for a conference call with the Court to discuss amendments to the case schedule.

WHEREFORE, the parties jointly request that this Court enter an order in the form attached hereto, amending certain case deadlines as reflected therein.

Respectfully submitted,

/s/ P. Wesley Lambert

James F. Koehler (0007904)
P. Wesley Lambert (0076961)
Koehler Neal LLC
3330 Erieview Tower, 1301 East 9th Street
Cleveland, OH 44114
Fax: (216) 916-4369
wlambert@koehlerneal.com
Attorneys for Hodell-Natco Industries, Inc.

/s/ Charles W. Zepp

Leo M. Spellacy, Jr. (0067304)
Charles W. Zepp (0068129)
PORTER WRIGHT MORRIS & ARTHUR LLP
925 Euclid Avenue, Suite 1700
Cleveland, OH 44115-1483
(216) 443-9000 / Fax (216) 443-9011
lspellacy@porterwright.com

/s/ Gregory J. Star

Michael J. Miller (admitted *pro hac vice*)
Gregory J. Star (admitted *pro hac vice*)
Drinker Biddle & Reath LLP
One Logan Square, Suite 2000
Philadelphia, PA 19103-6996
Telephone: (215) 988-2700
Facsimile: (215) 988-2757
Attorneys for SAP America, Inc. and SAP AG

/s/ Roy A. Hulme

Roy A. Hulme (0001090)
REMINER CO., L.P.A.
1400 Midland Building
101 Prospect Avenue, West

Cleveland, Ohio 44115

(216) 687-1311

Facsimile: (216)430-2250

rhulme@reminger.com

*Attorney for LSI-Lowery Systems, Inc. and The
IBIS Group, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of June 2012, a copy of the foregoing Joint Motion to Amend Case Deadlines was filed electronically. Parties may access this filing through the Court's electronic filing system.

/s/ Charles W. Zepp

Charles W. Zepp (0068129)